

REMARKS

Claims 1-26 are pending in the present application and stand rejected. Claims 1, 7, 9, 18, 20 and 26 have been amended. The Examiner's reconsideration is respectfully requested in view of the following remarks.

Claims 1-26 stand rejected under § 101

Claims 1-26 stand rejected under 35 U.S.C. § 101. Although Applicants disagree with the Examiner's contention that claims 1-26 are directed to non-statutory subject matter, Applicants have amended the claims in accordance with the Examiner's statement that such amendment would overcome the § 101 rejection.

Therefore, withdrawal of the rejection of claims 1-26 under 35 U.S.C. § 101 is respectfully requested.

Claims 1-26 stand rejected under § 103(a)

Claim 1 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Rodkin et al. (U.S. Patent No. 6,092,074) (hereinafter "Rodkin") in view of Liu et al. (U.S. Patent No. 5,794,257) (hereinafter "Liu") and further in view of Foss et al. (U.S. Patent No. 5,404,534) (hereinafter "Foss"). The rejection is respectfully traversed.

Applicants fully maintain the arguments presented in the response to paper 20041122 mailed on November 26, 2004. Applicants now address the Examiner's "Response to Arguments."

The Examiner asserts that under a broadest reasonable interpretation, the hard-coded links of Rodkin can be interpreted as being "computer generated and therefore

considered automatically generated.” Applicants respectfully direct the Examiner to col. 2, lines 21-29 Rodkin which states the following:

However, these links are “hard coded.” That is, the *developer* of a computer file using hyperlinks (e.g., *a Web developer*) establishes connections for the links that remain *static*. The developer can *manually* reposition the links, but their static nature remains. One important problem facing the *developer*, then, is where to point the hard coded hypertext or graphics links. The *developer* must choose wisely, because the link will have to be *manually changed* later if the developer’s preferences change.

The text above unambiguously establishes that the links of Rodkin are created *manually* by the developer and must be *manually* changed, if at all. The Examiner’s contention that the links of Rodkin can be computer-generated directly *contradicts* the text of the reference. Once again, Applicants submit that hard-coded link (i.e., a previously-assigned and permanent link) clearly *teaches away* from having a mechanism that *manually generates* static hyperlinks.

The Examiner further asserts that col. 5, lines 19-32 and col. 6, lines 31-47 of Foss discloses “wherein the source identifier and the source anchor generator support the application of the incremental hyperlinker and the source-level dynamic hyperlinker on document objects at different hyperlinking stages.” The Examiner argues that col. 2, lines 6-14 of Liu teaches “the incremental hyperlinker” and that col. 2, lines 42-58 and col. 3, lines 26-34 of Rodkin disclose “the source-level dynamic hyperlinker.” Assuming, *arguendo*, that the Examiner’s arguments are valid, the Examiner’s citation of col. 5, lines 19-32 and col. 6, lines 31-47 of Foss do not explain how the combination of references teach that the source identifier and the source anchor generator *support* the application of the unrelated portions of Liu and Rodkin on document objects, as essentially claimed in claim 1.

The Examiner contends that “[o]ne of ordinary skill in the art would have been able to connect the known techniques since they are in the same technological area.” The Examiner’s reasoning is a *non sequitur* that simply ignores the Applicants’ argument – that the citation to Foss does not reasonably *support* its application to unrelated portions of Liu and Rodkin on document objects, as essentially claimed in claim 1. Further, the Examiner’s statement is provided without any citation to the references to establish knowledge in the skill of the art at the time of the invention. Thus, the only reasonable explanation left is that the Examiner’s statement is conclusory and without merit.

It is noted again that the Examiner provides only a speculative motivation to combine the references. Applicants disagree that the Examiner’s proposed combination of references is known to those skilled in the art at the time of the invention. Applicants respectfully requested express support in the references or in other text establishing that knowledge of such a combination was generally available to one having ordinary skill in the art.

Regarding claims 9 and 18, the combination of Rodkin, Liu, Chang and Foss does not teach or suggest “wherein the source and the source anchor support *incremental hyperlinking and dynamic hyperlinking at different hyperlinking stages for extracting information from accessible documents at each of the different hyperlinking stages.*”

Accordingly, claim 1 is believed to be patentably distinguishable and nonobvious in view of Rodkin, Liu and Foss. Claims 7, 9, 18, 20 and 26 are believed to be patentably distinguishable and nonobvious in view of Rodkin, Liu, Foss and Chang. Dependent claims 2-6 are believed to be allowable for at least the reasons given for claim 1. Dependent claims 8, 10-17, 19, and 21-25 are believed to be allowable for at least the

reasons given for claims 7, 9, 18, 20 and 26. Withdrawal of the rejection of 1-26 under 35 U.S.C. §103(a) is respectfully requested.

In view of the foregoing remarks, it is respectfully submitted that all the claims now pending in the application are in condition for allowance. Early and favorable reconsideration is respectfully requested.

Respectfully submitted,

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